

United States District Court
for the
Southern District of New York
Related Case Statement

Full Caption of Later Filed Case:

Hudson Private LP

Plaintiff	Case Number
vs.	To be determined
Creative Wealth Media Finance Corp.	
Defendant	

Full Caption of Earlier Filed Case:

(including in bankruptcy appeals the relevant adversary proceeding)

Hudson Private LP

Plaintiff	Case Number
vs.	7:21-cv-08259
Bron Studios USA, Inc., Bron Creative USA Corp., Creative Wealth Media Finance Corp., and Jason Cloth	
Defendant	

Status of Earlier Filed Case:

☐

Closed

(If so, set forth the procedure which resulted in closure, e.g., voluntary dismissal, settlement, court decision. Also, state whether there is an appeal pending.)

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Open

(If so, set forth procedural status and summarize any court rulings.)

The Complaint was filed on October 6, 2021. Defendants have not yet responded to the complaint, as Plaintiff's so-ordered deadline to file an amended complaint is August 19, 2022. The Court has so-ordered a briefing schedule in connection with Defendants' anticipated motion to compel arbitration and to dismiss.

Explain in detail the reasons for your position that the newly filed case is related to the earlier filed case.

The newly filed case involves a claim by Plaintiff Hudson Private LP that Defendant Creative Wealth Media Finance Corp. breached a promissory note in connection with a film financing loan. The earlier filed case was filed by the same Plaintiff against the same Defendant (and others), claiming indebtedness to Plaintiff arising out of alleged film financing loans. Counsel for Plaintiff and Defendant are the same, and the actions will involve overlapping issues of law and fact concerning the agreements that the parties entered into.

Signature: /s/ Samuel J. Bazian
Herrick, Feinstein LLP

Date: June 28, 2022

Firm: _____